

**IN THE SUPERIOR COURT ROCKDALE COUNTY
STATE OF GEORGIA**

Francis Mannah
Plaintiff

§

V.

§

Edward Ted Decker (C.E.O)

§

Ann-Marie Campbell (Executive V.P)

§

Tim Hourigan (Human Resources)

§

Matt Carey (C.F.O)

Tanashier Miller (Store Manager

§

Michael Jackson (A.S.M)

Tunya Williams (Human Resources)

§

David Sharpton (D.M)

Marryb

ell Rotiz

Todd Bohannan

§

Kariny Thomas, et al

Defendants

§

Civil Action No. 2023 cv 1461

2023 MAR 30 AM 10:16

Janice Morris
CLERK

FILED IN OFFICE
CLERK SUPERIOR COURT
ROCKDALE CO., GA

COMPLAINT

Now Comes Francis Mannah, the Plaintiff and would show upon this

Honorable Court the following in support of his complain:

1. The Plaintiff is a resident of the State of Georgia
2. The Defendants are a corporation chartered in and registered to do business
in the State of Georgia.
3. The Plaintiff was an employee of the Defendants at the Defendants' location
at 1330 Dogwood Drive Conyers, Georgia 30013.

4. This tort claim action is brought under the Georgia Title 51- Torts O.C.G.A. § 9-3-33, 51-12-5.1, 51-12-6. Question authority.
5. This action is also under Title vii of the Civil Rights Act of 1964 and the 14th Amendment to the United States Constitution.
6. Francis Mannah (Plaintiff) an African American was employed at Home Depot from October 26, 2017, to August 25, 2022. Pursuant to Georgia Legislature Statue O.C.G.A. Section 34-8-190(c) of the Employment Security Law, states that an employer is required to provide the employee with the document, properly executed, prior to employment termination, giving the reason for the separation. O.C.G.A. Section 34-8-258 of the Employment Security Law provides that, to make any false statements or fail to disclose any material fact in connection with an unemployment insurance claim. **The violators will be prosecuted.** Plaintiff's separation notice stated, "violation of company policy safety." In addition to the defendants' false allegations that plaintiff violated of company policy safety, the defendants knowingly, willfully and with intent to induce harm and inflict pain and suffering to Plaintiff and Plaintiff's family members, submitted to Georgia Department of Labor a fabricated, false statement to justify discriminative and vindictive termination. As a result of defendant's discriminative actions, Plaintiff was denied unemployment benefits to

support and maintain his family in violation of the World Human Rights Charter Provisions. The Home Depot Job Description and the exculpatory evidence available by Defendants will show that the reasons leading up to plaintiff's employment separation by the Defendants are in total

contradiction. On February 25, 2023, Plaintiff send by the United States

Postal Service Certified mail number #7020 1290 0001 3184 2518 to the

C.E.O. of The Home Depot a request for public records pursuant to

Georgia Open Records Act O.C.G.A. § 50-18-70 and of the Freedom of

Information Act Pursuant to 5USC § 552. The request was received on

March 3, 2023. As of this March 28, 2023 Defendants knowingly and

willfully refused to acknowledge Legislation clearly established Statues of

both Federal and the State of Georgia. Defendants demonstrated prejudicial

and racial discriminative actions against Plaintiff and Plaintiff's family.

7. Plaintiff has been damaged as follow: Punitive damages; mental anguish; pain and suffering; racial discrimination; humanitarian suffering and deprivation of peace and happiness.

Wherefore, the Plaintiff prays that the proper process issue to the Defendants be done according to Georgia Civil Procedure Pursuant to Title 51 and that upon a hearing in this Honorable Court grant a judgement for the Plaintiff and against the Defendants for all actual, special compensatory, and punitive

damages to which this honorable Court deems the Plaintiff to be entitled and for attorney's fees, interest, court cost and any and all further relief under the applicable statutes mention above to which Honorable Court deems the Plaintiff to be entitled.

The Plaintiff further prays for any and all such other and further relief which this Honorable Court may grant and which this Court feels the Plaintiff to be entitled. Plaintiff demands that the jury try Plaintiff's cause.

This 30th day of March 2023

Respectfully Submitted



Francis Mannah
285 Trelawney Drive
Covington, Georgia 30016